

Exhibits 1 through 19

Exhibit 1



MENU



TICKETS

Opportunity to Renew Same Seat

Michigan Football Season Ticket Holders have the opportunity to obtain their same seat year after year. Additionally, seat upgrades/ticket additions may be requested each year.

Exclusive Events

Michigan Season Ticket Holders receive exclusive access to various events. To date, some of these events have included Movie Night at Michigan Stadium, early admission to Football Open Practice and Michigan

DOW

Exhibit 2

6/26/24, 9:25 PM

Ticket Office Frequently Asked Questions (General) - University of Michigan Athletics

TICKET OFFICE FREQUENTLY ASKED QUESTIONS (GENERAL)

• Other Ticket Office FAQs: Football | Students

What are the ticket office hours?

Monday through Friday 9 am to 5 pm. The office is closed on the weekends. Internet sales are available on **MGoBlue.com/tickets** 24 hours a day, seven days a week as available.

Note: Online ticket sales for an event end five hours before game time. After that, tickets may be purchased via phone at (866) 296-MTIX during regular business hours (9 a.m.-5 p.m. ET, Monday-Friday) or at the door if an event is not sold out.

How do I get to the athletic ticket office?

The ticket office is located at 1100 S State St., North of Yost Ice Arena. From I-94, take exit 177 to State St., turn North onto State St., approximately two miles. The ticket office is on the West side of State St., north of Yost Ice Arena.

From M-14, take exit 3 (downtown Ann Arbor), the exit runs into Main St. Continue south on Main St. through town and turn left on Packard, then right onto State St. The ticket office is the second building south of Hoover.

Does the ticket office send out order confirmations?

Ticket order confirmations are not mailed, but you will receive an email confirmation after your order is complete. You may also contact the ticket office for verification of your order at 734-764-0247 or **mtickets@umich.edu**.

What do I do if I have a ticket problem (i.e. lost tickets) and the ticket office is closed?

If the tickets have been lost or stolen, please go to the ticket office will call (of the event) and an available ticket representative will be able to assist you. If you are not the ticket holder, please bring documentation from the original ticket holder authorizing you to have access to those specific tickets.

Does the ticket office sell gift certificates?

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Ticket Office Frequently Asked Questions (General) - University of Michigan Athletics

The ticket office does not offer gift certificates at this time.

Does a baby/child need a ticket?

Michigan follows the Big Ten policy of requiring a ticket for everyone to football, men's basketball and ice hockey regardless of age including infants being carried and/or in back or front packs.

Children age **five and under** will be admitted free to the following U-M athletic home events:

- baseball
- softball
- women's basketball
- volleyball
- wrestling
- men's and women's soccer
- women's gymnastics

Ticket policies for select events (including NCAA and Big Ten tournaments) are subject to change.

Is it safe to purchase a ticket from people outside the stadium/arena?

Tickets not purchased through the Michigan Ticket Office or through the University's authorized agents are not considered valid and the holder may be denied admission or ejected. Tickets cannot be used for third party contests or sweepstakes without approval by the University of Michigan Athletic Department.

Attempting to sell or solicit the sale of a ticket(s) (even at face value) on campus without a permit violates University policy.

How can I have someone else pick up my tickets?

Student tickets must be picked up by the student with their valid student ID or by their spouse.

Tickets ordered by the general public, faculty, or alums can be picked up by a third party if the request is made at the time of the order. Any requests for third party pickup after the initial order, must be accompanied by a signed letter from the purchaser naming the party authorized to pick up the tickets.

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Ticket Office Frequently Asked Questions (General) - University of Michigan Athletics

Is it possible to transfer my season tickets to any person?

Yes. If you would like to transfer tickets to an individual game, visit [MGoBlue.com/tickets/transfer](https://mgoblue.com/tickets/transfer). If you are interested in permanently transferring all or some of your season tickets, so that someone else becomes the season ticket holder for those seats, visit [MGoBlue.com/go/transfer](https://mgoblue.com/go/transfer).

I recently married; can I add my spouse's name to my account?

Yes. To do so, please send us a written request signed by you and a copy of your marriage certificate. Only a spouse's name can be added to your account. To remove a spouse's name, please send us a notarized written request signed by the both of you or a certified copy of your divorce papers.

How do I change my email or home address?

You can mail a copy of your current driver's license with address corrections to the Michigan ticket office, 1000 S State St, Ann Arbor, MI 48109. Please list your old address as well as your new one so we may accurately identify your record. You may also fax this information to 734/936-8942.

What events do faculty and staff get into for FREE?

With a valid MCard U-M Faculty and Staff receive FREE admission to all Michigan Athletics sporting events with the exception of Football, Men's Basketball and Ice Hockey. Free admission will be granted **ONLY** when tickets are still available. Free admission is not guaranteed for sellout matches.

In the event of a sellout, anyone who would typically enter with their MCard is encouraged to purchase tickets through our general public offer.

Full-Time Faculty/Staff Discount: Full-time, permanent University of Michigan faculty and staff members receive a 10% discount for football, men's basketball and hockey season tickets. There is a limit of 2 discounted season tickets per sport, and additional tickets must be purchased at the public price. Faculty/staff must follow the current process to obtain season tickets which may involve a donation or deposit. For more information visit [MGoBlue.com/ticketoffice](https://mgoblue.com/ticketoffice). To receive this discount, email a copy of your MCard and your athletic ticket account number to mtickets@umich.edu.

Note: Online ticket sales for an event end five hours before game time. After that, tickets may be purchased via phone at (866) 296-MTIX during regular business hours (9 a.m.-5 p.m. ET, Monday-Friday) or

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Ticket Office Frequently Asked Questions (General) - University of Michigan Athletics

at the door if an event is not sold out. The only payment accepted at the door of an event is a debit or credit card.

Exhibit 3

6/26/24, 8:41 PM

Football Season Ticket Transfer - University of Michigan Athletics

FOOTBALL SEASON TICKET TRANSFER

Michigan Athletics is proud to offer season ticket holders the opportunity to transfer football season tickets.

Based on donor feedback, this service is available annually to offer the convenience of reallocating a season ticket location to a new owner.

The season ticket transfer window is subject to change each year and fees vary based on seat location in Michigan Stadium.

The 2024 season ticket transfer window will be available from November 1, 2023 through December 8, 2023.

Tier	Transfer Fee (Per Seat)
Indoor club	\$2,000
Outdoor club zone 1	\$1,850
Outdoor club zone 2	\$1,350
Outdoor club zone 3	\$900

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Football Season Ticket Transfer - University of Michigan Athletics

Tier	Transfer Fee (Per Seat)
West side chairback zone 1	\$1,250
West side chairback zone 2	\$725
Victors	\$700
Valiant	\$550
Maize	\$400
Blue	\$225
End Zone	\$80

Football Season Ticket Transfer Terms and Conditions

Below are terms and conditions of transferring Michigan Football season tickets:

- Season ticket transfers are permanent. The ticket transfer recipient becomes the new season ticket holder for the seats that were transferred.
- The ticket transfer fee does not replace the preferred seat contribution. The ticket recipient must pay the preferred seat contribution in the first year and each successive year in order to have the opportunity to renew the season tickets.
- Season ticket transfer requests must be submitted by the indicated deadline.
- Season ticket transfer recipients must be 18 years of age or older.
- Season tickets can only be transferred to individuals; not to businesses or organizations.
- Parking is not transferrable.
- Priority points cannot be transferred.
- Complimentary tickets are not eligible for transfers.
- Student season tickets may not be transferred.
- In accordance with the tax legislation effective January 1, 2018, donations associated with the purchase of tickets are no longer tax deductible.
- Faculty/staff tickets transferred to a non-faculty/staff member will no longer be subject to the faculty/staff discount. The ticket recipient will be charged full price for the tickets.
- There is a maximum of 8 bowl tickets and 8 premium tickets per account. Transfer requests that extend beyond these limits on a single account will be denied.

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Football Season Ticket Transfer - University of Michigan Athletics

- Season ticket transfer fees are non-refundable and the transfer cannot be revoked, regardless of whether or not the ticket recipient takes the necessary steps to receive the tickets.

Online Season Ticket Transfer

Step by step instructions for completing the online season ticket transfer form can be found by following the link below. If you have any questions regarding the season ticket transfers, please call (734) 764-0247 or email mtickets@umich.edu.

INSTRUCTIONS

ONLINE FORM

Transferring to Multiple People

The online application does not allow for transfers to multiple people. If you are transferring tickets to multiple people, please fill out a paper form for each recipient and mail to the address provided on the form.

PDF FORM

Single-Game Transfers

If you would like to transfer tickets to a single game, rather than your full season tickets, visit Single Game Ticket Transfers or login to your account.

Exhibit 4

Smeltzer, Rob

From: Smeltzer, Rob
Sent: Wednesday, June 26, 2024 9:00 PM
To: Smeltzer, Rob
Subject: FW: Michigan Athletics Needs You

From: Kevin Brick
Sent:
To: Smeltzer, Rob
Subject: Re: Michigan Athletics Needs You

Michigan Football Season Tickets - University of Michigan Athletics (mgoblue.com)

- StubHub

Michigan Football Season Ticket Holders have the opportunity to re-sell their season tickets through an integrated and easy to use platform with StubHub, the official fan-to-fan marketplace for Michigan Athletics. This relationship helps Season Ticket Holders utilize their ticket use to help ensure their ticket investment is fully optimized.

BENEFITS FOR 2022

-
- Opportunity to Renew Same Seat

Michigan Football Season Ticket Holders have the opportunity to obtain their same seat year after year. Additionally, seat upgrades/ticket additions may be requested each year.

Exhibit 5

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Michigan Football Season Tickets - University of Michigan Athletics

MICHIGAN FOOTBALL SEASON TICKETS

HOW TO BECOME A SEASON TICKET HOLDER

The deadline to join the 2022 new football season ticket list was Friday, April 29, 2022. Information on new season tickets for the 2023 season will be available soon.

Football season tickets are based upon availability and will be allocated according to PRIORITY POINTS. While we will anticipate being able to offer season tickets to those joining the 2022 football new season ticket list, new season tickets are not guaranteed and based on availability.

To view your current priority point total and utilize our priority points calculator, please visit: MY PRIORITY POINTS.

Season	# of New Requests/Season Ticket List Donations	% Offered Season Tickets	Minimum Points to be Offered Tickets
2022	1,598	100%	1.5
2021	885	100%	1.5
2020	876	100%	1.5
2019	877	83%	2
2018	789	100%	1.5
2017	1,024	39%	22

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Michigan Football Season Tickets - University of Michigan Athletics

Season	# of New Requests/Season Ticket List	% Offered Season	Minimum Points to be Offered
	Donations	Tickets	Tickets
2016	1,398	100%	1.5
2015	2,093	100%	1.5

WHAT YOU SHOULD KNOW

- New season ticket offers will be communicated via email in May 2022.
- New season tickets are generally located in the endzone.
- New season ticket offers are generally limited to two (2) season tickets. If availability permits, new season ticket holders will be able to select up to four (4) season tickets.
- New season ticket holders purchasing two endzone tickets will not pay a Preferred Seat Contribution in their first year as this is covered by your new season ticket list contribution.
- If you are able to and select seat locations outside the endzone or more than two (2) tickets, you will pay the difference in the Preferred Seat Contribution.

3D SEATING
MICHIGAN STADIUM

BENEFITS FOR 2022

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Opportunity to Renew Same Seat

Michigan Football Season Ticket Holders have the opportunity to obtain their same seat year after year. Additionally, seat upgrades/ticket additions may be requested each year.

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Michigan Football Season Tickets - University of Michigan Athletics

Exclusive Events

Michigan Season Ticket Holders receive exclusive access to various events. To date, some of these events have included Movie Night at Michigan Stadium, early admission to Football Open Practice, and Michigan Marching Band rehearsal.

Ticket Prices

Michigan Football Season Ticket Holders pay the lowest price per season. As a season ticket holder you receive the lowest averaged price across all games.

Ticket Presales

As a Donor and Michigan Football Season Ticket Holder, you have priority access to all Michigan Football ticketed opportunities (Ticket Packs, Single Games, Away Games, Neutral-Site Games, Bowl Games, etc). Included in past years was early access to the International Champions Cup soccer matches.

StubHub

Michigan Football Season Ticket Holders have the opportunity to re-sell their season tickets through an integrated and easy to use platform with StubHub, the official fan-to-fan marketplace for Michigan Athletics. This relationship helps Season Ticket Holders utilize their ticket use to help ensure their ticket investment is fully optimized.

Individual Game Ticket Transfer

Michigan Season Ticket Holders that would like to allow someone else to use their tickets for a game can electronically email their individual game tickets to a recipient of their choice. For more

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Michigan Football Season Tickets - University of Michigan Athletics

information, visit [MGoBlue.com/tickets/transfer](https://mgoblue.com/tickets/transfer).

Season Ticket Transfer

Season Ticket Holders can permanently transfer their season tickets so that someone else becomes the season ticket holder for those seats. For more information, visit [MGoBlue.com/go/transfer](https://mgoblue.com/go/transfer).

Priority Points

One point is awarded for each year of season ticket purchases (since 1992). The Priority Points Program provides a framework for the equitable allocation of donor experiences, such as eligibility for gameday parking, away game tickets, individual game tickets, and season ticket upgrades. For a complete breakdown of how Priority Points are calculated, please visit [support.MGoBlue.com](https://support.mgoblue.com).

M Den

At various points of the year, Michigan Football Season Ticket Holders receive exclusive offers and discounts at our official retail partner, the M Den.

Commemorative Big Ten Championship Ticket

Michigan football season ticket holders will be mailed a commemorative ticket to celebrate Michigan's 2021 Big Ten Championship title.



Exhibit 6

Smeltzer, Rob

From: Smeltzer, Rob
Sent: Wednesday, June 26, 2024 8:37 PM
To: Smeltzer, Rob
Subject: FW: Michigan Athletics Needs You

----- Forwarded message -----

From: Patrick Gray <pmgray@umich.edu>
Date: Thu, Aug 6, 2020 at 3:14 PM
Subject: Michigan Athletics Needs You
To: Kevin Brick <kbrick23@gmail.com>

Kevin,

I hope this email finds you well and on behalf of Michigan Athletics, I would like to thank you for being a Football season ticket holder. Your support ensures that Michigan student-athletes are supported on and off the field with the resources necessary for success.

I am following up on an email you received from Athletic Director, Warde Manuel, this week about the state of our department. The email indicated many areas in which Michigan Athletics will be impacted during this uncertain time. Some of the areas highlighted included a minimum \$26.1 million deficit, which threatens our ability to support our over 900 student-athletes. In addition, the email mentioned that there will not be season tickets during the 2020 football season, which will result in a need to choose one of three options. If you would like to read the full email, visit MGoBlue.com.

As a season ticket holder and loyal supporter of Michigan Athletics, I ask that you consider donating your PSC and/or season ticket payments to the Champions Fund. To learn more about the Champions Fund and its impact on the experience for our student-athletes, please visit our [support page](#). By donating your 2020 PSC/season ticket payments you will receive 100 priority points (equivalent to a \$10,000 donation to Michigan Athletics) and a 20% discount for the PSC and season ticket value for the 2021 season. Of equal importance, you will have a hand in providing some financial stability in an otherwise difficult time.

These are challenging times for everyone so this request doesn't come lightly. We truly appreciate your support and hope you will consider donating your 2020 PSC and/or season ticket payments. To do so, please fill out [this form](#). Should you wish to discuss any particulars in greater detail, please do not hesitate to respond.

Thank you again for everything you do for Michigan Athletics and as always, GO BLUE!

Patrick

Patrick Gray

SENIOR DIRECTOR OF DEVELOPMENT | Development
University of Michigan Athletic Department | Stephen M. Ross Athletic Campus
1000 South State Street | Ann Arbor, MI 48109-2201

MGoBlue.com | Support.MGoBlue.com | Office: (734) 615-6925 | Cell: (734) 846-6305

Visit our new and improved Support.MGoBlue.com!

Exhibit 7

From: [Friedman, Alyssa](#)
To: foia-email@umich.edu
Cc: [Smeltzer, Rob](#)
Subject: FOIA Request
Date: Monday, March 25, 2024 6:10:56 PM
Attachments: [image001.png](#)

To Whom It May Concern,

This is a request for access to the records listed below pursuant to the Michigan Freedom of Information Act. I am requesting an opportunity to inspect or obtain copies of the following, with the time period being the last 10 years of today's date:

1. All letters of intent, memoranda of understanding, contracts, and draft contracts between the University of Michigan and Eventellect on the subject of athletic ticket reselling;
2. All communications between the University of Michigan and actual or prospective football season ticket holders and actual or prospective preferred seat contributors ; and
3. The terms and conditions applicable to such football season tickets and/or preferred seat contributions.

The Michigan Freedom of Information Act requires a response to this request be made within 5 business days after receipt of this request. If access to the requested records will take longer than this amount of time, please contact me with information as to when such records may be available.

Thank you,



Alyssa Friedman

afriedman@ktslaw.com

Kilpatrick Townsend & Stockton LLP

175 West Jackson Blvd. | Suite 950 | Chicago, IL 60604

T 312 628 7864 | **M** 949 324 0233 | **F** 312 896 5754

[My Profile](#) | [vCard](#)

Exhibit 8

From: [Carolyn Umbricht](#)
To: [Friedman, Alyssa](#)
Cc: foia-email@umich.edu; [Smeltzer, Rob](#)
Subject: FOIA FRI 0304-24 extension
Date: Tuesday, April 2, 2024 9:50:39 AM
Attachments: [image001.png](#)

****CAUTION: External Email****

Dear Alyssa Friedman,

I am writing in regard to your Freedom of Information Act request dated March 25, 2024, which was received on March 26, 2024.

Due to the large number of requests currently being processed by this office, it will not be possible to respond to your request within the five-day period accorded by the Michigan Freedom of Information Act. However, under Section 5 (2) (d) of the Act, the University is permitted to extend the deadline for not more than 10 business days beyond the initial due date.

The University will respond to your request on or before April 16, 2024.

Thank you,

Carolyn

Carolyn Umbricht
Freedom of Information Act Office | University of Michigan

3300 Ruthven Building
1109 Geddes Ave
Ann Arbor, MI 48109-1079

(fax) 734.763.1399 | caumbric@umich.edu

On Mar 25, 2024, at 7:10 PM, Friedman, Alyssa <afriedman@ktslaw.com> wrote:

To Whom It May Concern,

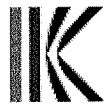
This is a request for access to the records listed below pursuant to the Michigan Freedom of Information Act. I am requesting an opportunity to inspect or obtain copies of the following, with the time period being the last 10 years of today's

date:

1. All letters of intent, memoranda of understanding, contracts, and draft contracts between the University of Michigan and Eventellect on the subject of athletic ticket reselling;
2. All communications between the University of Michigan and actual or prospective football season ticket holders and actual or prospective preferred seat contributors ; and
3. The terms and conditions applicable to such football season tickets and/or preferred seat contributions.

The Michigan Freedom of Information Act requires a response to this request be made within 5 business days after receipt of this request. If access to the requested records will take longer than this amount of time, please contact me with information as to when such records may be available.

Thank you,



Alyssa Friedman

afriedman@ktslaw.com

Kilpatrick Townsend & Stockton LLP

175 West Jackson Blvd. | Suite 950 | Chicago, IL 60604

T 312 628 7864 | M 949 324 0233 | F 312 896 5754

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Confidentiality Notice:

This communication constitutes an electronic communication within the meaning of the Electronic Communications Privacy Act, 18 U.S.C. Section 2510, and its disclosure is strictly limited to the recipient intended by the sender of this message. This transmission, and any attachments, may contain confidential attorney-client privileged information and attorney work product. If you are not the intended recipient, any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. Please contact us immediately by return e-mail or at 404 815 6500, and destroy the original transmission and its attachments without reading or saving in any manner.

Exhibit 9

From: [Shannon Hill](#)
To: [Friedman, Alyssa](#)
Cc: [Freedom of Information Act Office](#); [Smeltzer, Rob](#)
Subject: FOIA FRI 0304-24
Date: Thursday, April 11, 2024 12:18:28 PM

****CAUTION: External Email****

Dear Alyssa Friedman,

I am writing in response to your Freedom of Information Act request dated March 25, 2024, which was received on March 26, 2024.

You requested:

I am requesting an opportunity to inspect or obtain copies of the following, with the time period being the last 10 years of today's date:

1. All letters of intent, memoranda of understanding, contracts, and draft contracts between the University of Michigan and Eventellect on the subject of athletic ticket reselling;
2. All communications between the University of Michigan and actual or prospective football season ticket holders and actual or prospective preferred seat contributors ; and
3. The terms and conditions applicable to such football season tickets and/or preferred seat contributions.

There are no records responsive to item (1) of your request.

Item (2) of your request is overly broad and, pursuant to Section 3 (1) of the Michigan Freedom of Information Act, does not describe a "public record sufficiently to enable the public body to find the public record..." Please identify or describe specifically the records you are seeking by providing the name(s) of the employee(s) and/or office(s) whose communications you are seeking and the relevant subject matter and/or keyword(s) for the records you are seeking. Upon receipt of additional information that will enable us to find responsive records, we will be happy to proceed with processing a revised request.

Regarding item (3) of your request, this office was advised that responsive ticket policies are outlined on the following Michigan Athletics web pages:

- [Main Football Ticket Page](#)
- [Football Season Ticket Renewal Page](#)
- [Football Season Ticket Upgrade Page](#)
- [Ticket Policies and Forms Page](#)

Please note that within 180 days from the date of this letter, you have the right to appeal the denial of information to the President of the University or seek judicial review in the court of claims to try to compel disclosure. If you elect to appeal and the President upholds the denial, you may still seek judicial review within the 180-day period.

An appeal to the President must be submitted in writing to: President's Office, c/o Steve Yaros, The University of Michigan, Ruthven Bldg. Suite 3190, 1109 Geddes Ave., Ann Arbor, Michigan 48109-1079 (or by email to: FOIAappeals@umich.edu). The statement must (1) identify the request and the final determination by the FOIA officer that is being appealed, (2) specifically state the word "appeal," and (3) identify the reason or reasons why the final determination should be reversed.

If you seek judicial review in the Michigan court of claims and prevail, you will be awarded reasonable attorney's fees, costs and disbursements incurred in maintaining the action. If you prevail in part, you may still be awarded complete or partial reimbursement for those expenses. In addition to actual and compensatory damages, you will be awarded punitive damages in the amount of \$1,000.00 if the court finds that the University was arbitrary and capricious in its denial.

A copy of Section 10 of the Michigan FOIA is available for your reference and review online at <http://foia.vpcomm.umich.edu/foia-right-to-appeal/>.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Hill". The signature is fluid and cursive, with the first name "Shannon" and last name "Hill" clearly distinguishable.

Shannon Hill
Acting Chief Freedom of Information Act Officer
Freedom of Information Act Office | University of Michigan
<http://foia.vpcomm.umich.edu> | hillsr@umich.edu | (734) 763-4167

Exhibit 10

6/27/24, 10:47 AM

Football Tickets



MICHIGAN FOOTBALL

Tickets & Promotions

Sign up for This Week in Michigan Football to receive the latest updates, special offers and more, straight to your inbox.

[Sign Up for Updates >](#)

QUICK LINKS



MY ACCOUNT

Log in to your ticket account to purchase or manage your tickets.



THIS WEEK IN MICHIGAN FOOTBALL

Stay up to date with Michigan Football!

TICKET

Sign up to receive promotions

CFP NATIONAL CHAMPIONS

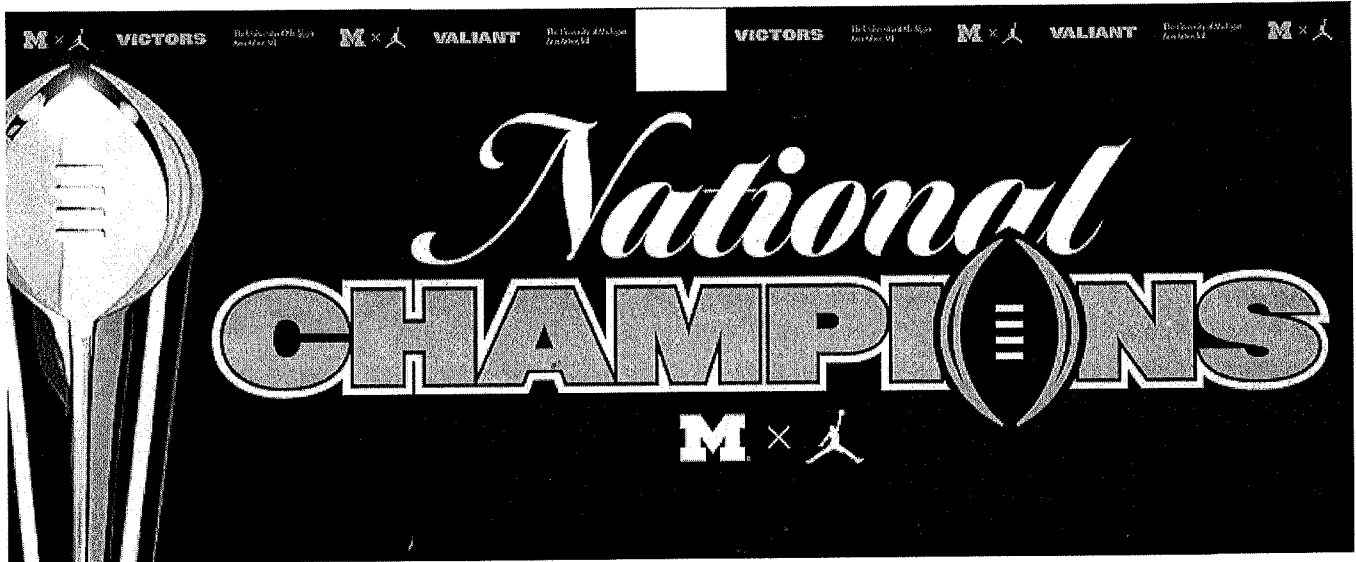
The Wolverines became the 2023 CFP national champions following their 34-13 win over No. 2 Washington on Jan. 8. It is the 12th national title in program history and the first since the end of the 1997 season.

Go Blue!

[Special Coverage >](#)

6/27/24, 10:47 AM

Football Tickets



GO BLUE TICKET PACKS

Ticket packs for the 2024 football season are sold out. Individual game ticket sales begin Tuesday, July 9 based on priority in the Single-Game Tickets section below. Inventory is extremely limited and not all games will be available.

You may also visit **SeatGeek** for Michigan Football ticket options.

Sold Out ✓

Interest Form >

MGO TROOPS

Please note: We have reached capacity, and the MGoTroops program is currently closed to the public for donations. Season ticket holders will have a chance to donate tickets to the MGoTroops program in August.

6/27/24, 10:47 AM

Football Tickets

Michigan Athletics will email season ticket holders this summer with additional details.

How the MGoTroops program works: Fans can show their support by purchasing tickets for the September 28, 2024 Military Appreciation game vs. Minnesota to be donated to current and former members of the military. Prior to and during the game, Michigan Athletics and our fans will recognize and honor our military who have served, or are serving, our country.

[Learn More >](#)

SINGLE-GAME TICKETS

Single-game tickets will go on sale July 9-12, 2024 according to the following timeline. Please note that inventory is extremely limited and not all games will be available.

- July 9 - Donors with 500+ points -
- July 10 - Donors with 250+ points -
- July 11 - Donors with 1+ point -
- July 12 - Digital Community -

SINGLE-GAME TICKET PRICING

Aug. 31
TBA



Fresno State














\$50-125

Sept. 7
Noon



6/27/24, 10:47 AM

Football Tickets

\$200-295		▼
Sept. 14 TBA		
		
\$50-125		▼
Sept. 21 TBA		
		
\$200-295		▼
Sept. 28 TBA		
		
\$70-160		▼
Oct. 26 TBA		
		
\$200-295		▼
Nov. 2 TBA		
		
\$200-295		▼
Nov. 23 TBA		
		
\$70-160		▼

☐ Available
 ☐ Limited
 ☐ Singles Only
 ☐ Sold Out

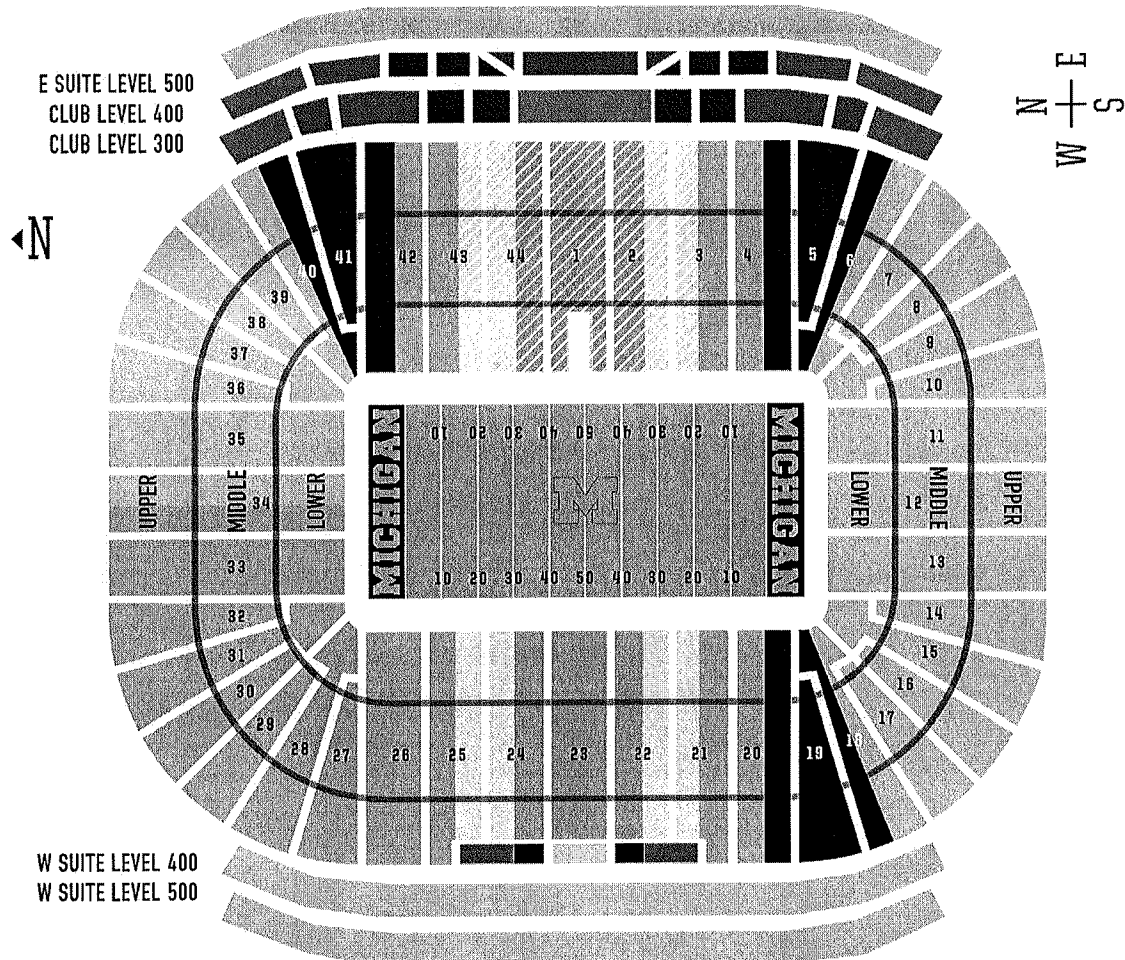
Lower = Row A-Row 30 | Middle = Row 31-Row 60 | Upper = Row 61+

6/27/24, 10:47 AM

Football Tickets

MICHIGAN STADIUM

2024 Football Preferred Seat Contribution



Click seating map to see full key

6/27/24, 10:47 AM

Football Tickets

SEASON TICKETS

NEW SEASON TICKETS

Season tickets for the 2024 season are sold out. Be first to learn about future Michigan Football season tickets opportunities by filling out the **football ticket interest form**.

[Interest Form >](#)

SEASON TICKET RENEWALS

2024 season ticket renewals are now complete. All information related to renewing Michigan football season tickets can be found on our season ticket renewal page.

[Learn More >](#)

SEASON TICKET UPGRADES

Season ticket holder upgrades will take place May 13-24, 2024.

[Learn More >](#)

PREFERRED SEAT CONTRIBUTIONS

We are looking forward to having you back in Michigan Stadium this fall.

[Learn More >](#)

AWAY GAMES

Away game ticket requests were sent via email on Monday, April 22, 2024 to eligible season ticket holders/donors.

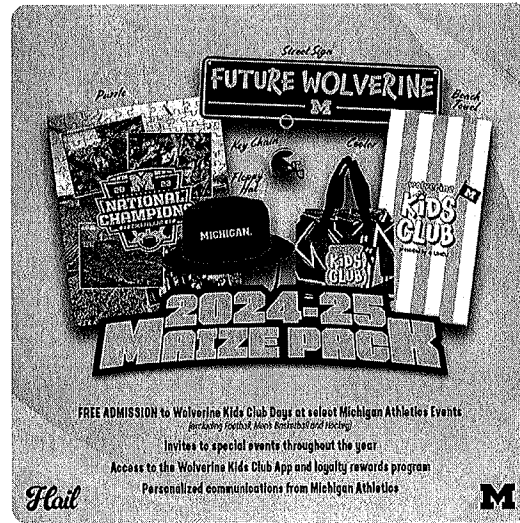
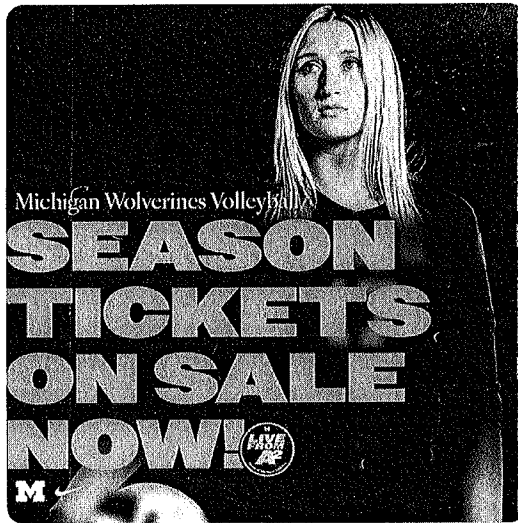
TICKET TRANSFER

Season Ticket Holders: can't make it to the game? Transfer your season tickets up to 3 hours before game time or donate your season tickets up to 24 hours before game time. Take advantage of this benefit!

[Learn More >](#)

6/27/24, 10:47 AM

Football Tickets



MICHIGAN STADIUM

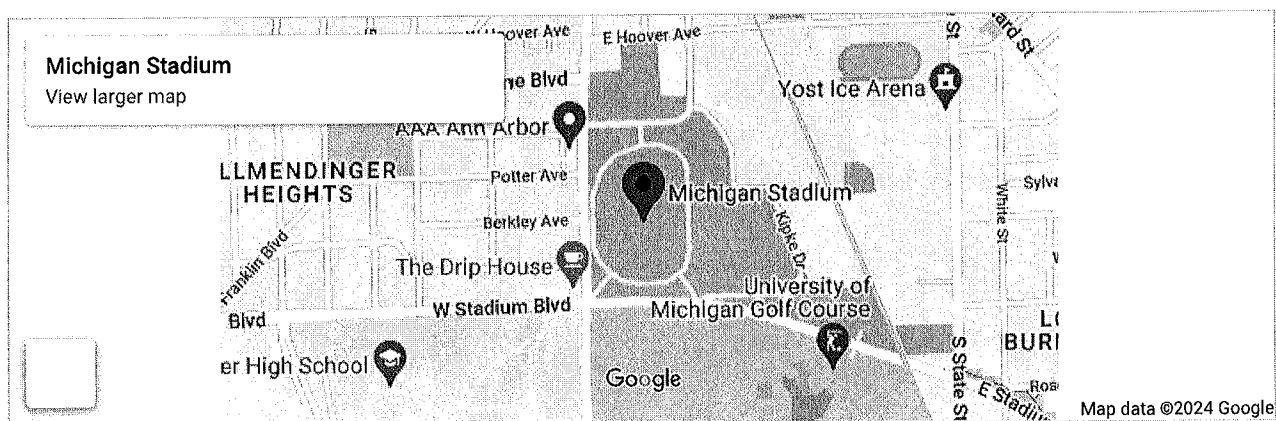
6/27/24, 10:47 AM

Football Tickets

ADDRESS

1201 S Main St., Ann Arbor, MI 48104

USEFUL LINKS

[Michigan Stadium Guide](#)[Seating Chart](#)[Map & Directions](#)

TICKETING A TO Z

[Michigan Stadium](#)[Information Guide](#)[Michigan Stadium Map](#)

6/27/24, 10:47 AM

Football Tickets

Michigan Stadium in 3D	>
Single-Game Ticket Transfer	>
Season Ticket Transfer	>
Premium Seating in Michigan Stadium	>
Book Your Full-Service Tailgate	>
Souvenir Tickets	>
Wolverine Seats	>
Virtual Tours	>
Football Schedule	>
Student Tickets	>
Mobile Ticketing	>
MGoTroops	>
Parking Information	>
Safety at Michigan Stadium	>
Guests with a Disability	>
Ticket	>
Security	>
Policies	>
& Forms	>
FAQs	>
Free Admission Sports	>
Sign Up for Michigan Insider	>

CONTACT US

The Michigan Ticket Department is located on the South Campus athletic complex on South State Street. The Ticket Office is directly accessible from I-94 at the State Street exit #177, and also can be reached off the Ann Arbor-Saline exit #175, or Jackson Road exit #172.

6/27/24, 10:47 AM

Football Tickets

⌚ Hours

- 5 p.m. (ET) Monday-Friday

☎ Phone

(734) 764-0247 or (866) 296-MTIX

📍 Address

1000 South State St., Ann Arbor, MI 48109

✉ Email

mtickets@umich.edu

Online ticket sales for an event end five hours before game time. After that, tickets may be purchased via phone at **(866) 296-MTIX** during regular business hours (9 a.m.-5 p.m. ET, Monday-Friday) or at the door if an event is not sold out. The only payment accepted at the door of an event is a debit or credit card.

TICKET AGREEMENT

Tickets may not be purchased for the primary purpose of resale and may be cancelled at the discretion of Michigan Athletics. Michigan Athletics reserves the right to monitor sales and withhold season ticket renewal opportunities or cancel ticket orders from accounts that exhibit activity consistent with that of a ticket broker. Ticket brokers are defined as ticket holders who purchase tickets with the primary intent of reselling their tickets for profit or whose accounts indicate high levels of secondary market activity.

Season ticket holders attempting to circumvent established ticket limits by creating numerous accounts may have their tickets canceled at the discretion of Michigan Athletics. Season ticket holders may not have more than eight total regular season tickets and eight total premium season tickets.

If Michigan Athletics detects activity in violation of established policies or indicative of ticket brokering, we reserve the right to reduce or remove number of season tickets for future seasons without notification. We also reserve the right to limit access to standard season ticket benefits to include but not limited to donor onsales for ticket packs/individual game sales, away game tickets, season ticket upgrades, postseason ticketing, etc.



SPORTS

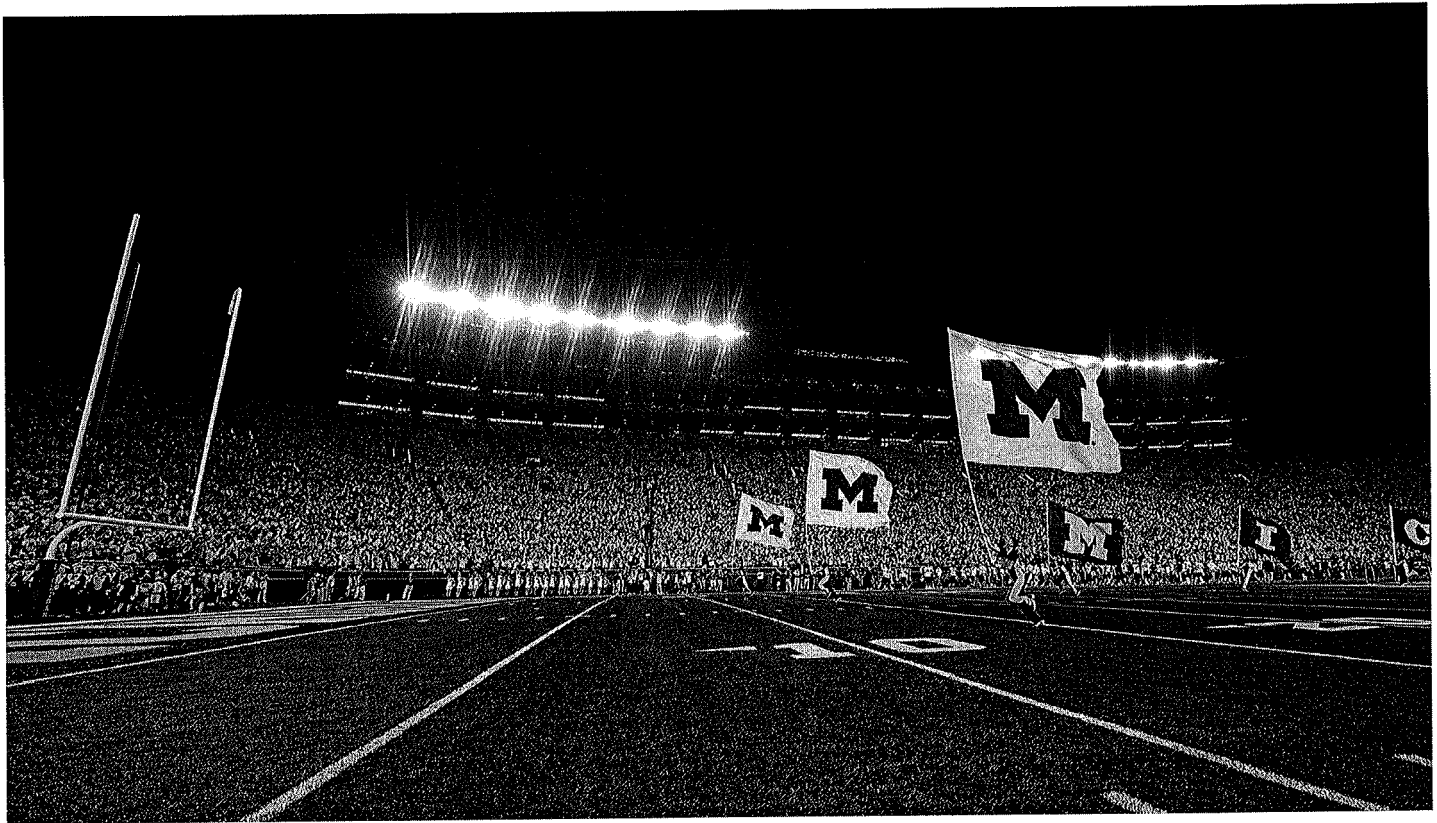
[Privacy Policy](#) [Terms of Service](#)

Exhibit 11

6/27/24, 10:48 AM

Football Season Ticket Renewal - University of Michigan Athletics

FOOTBALL SEASON TICKET RENEWAL



Welcome to Renewal Central, Michigan Football Season Ticket Holders' destination for all information related to renewing their Michigan football season tickets.

FOOTBALL SEASON TICKET RENEWALS

Important ticket dates for the 2024 Football Season:

- **January 31:** Football PSC/season ticket renewals begin
- **February 29:** Deadline to pay in full or opt into a payment plan. For those who opt into the payment plan, the credit card on file will be automatically charged on the following dates:
 - 1/4 at the time of renewal
 - 1/4 on March 18
 - 1/4 on April 8
 - 1/4 on April 29
- **April/May (Dates TBD):** Away game ticket purchase period
- **May 13-24:** Football season ticket upgrades available

6/27/24, 10:48 AM

Football Season Ticket Renewal - University of Michigan Athletics

ONLINE RENEWAL INSTRUCTIONS

Note: Please use one of the supported web browsers listed at the bottom of the Season Renewals login screen.

- Review the **Season Ticket Renewal Policies**.
- Go to **MGoBlue.com/tickets** and click on **Renewals/Season Ticket Renewals** or you can now **login in directly**.
- Login with your email address and password. If you don't know your password, select the "Forgot Password" option to have a temporary password link emailed to you. You can also choose the simplicity of a one-time passcode (OTP) over a traditional password. The passcode is sent to your email and adds an additional layer of security.
- After logging in, you will see the link for your application.
- If you need assistance with your online season ticket account or login, please email mtickets@umich.edu or call 866-296-6849 between 9 a.m. - 5 p.m. Monday through Friday.

MOBILE TICKETS

Michigan Athletics continues the transition to mobile tickets for home football events. As communicated prior to last year's season ticket renewals, all tickets for the 2024 season will be mobile.

Michigan Athletics is moving towards all mobile ticketing for the 2024 football season for the following reasons:

- Limited industry support for printed tickets
- Increased protection against fraudulent tickets
- Reduction of lost, stolen, forgotten, or damaged tickets
- Be consistent with all other University of Michigan Athletic events
- Provide a safe and contactless venue entry
- With the future College Football Playoff expansion to a 12 team format, games may be hosted in Ann Arbor and mobile tickets are required

6/27/24, 10:48 AM

Football Season Ticket Renewal - University of Michigan Athletics

SEAT UPGRADE REQUEST

Football season ticket upgrades will take place from May 13-24, 2024. Each season ticket holder will be assigned an upgrade start time, based on priority point total. Once your start time arrives, you will be able to adjust your seat location via an online seating tool displaying all available inventory. More information to come this Spring.

2024 SCHEDULE

Home games (bold) at Michigan Stadium

Date	Opponent
August 31	FRESNO STATE
September 7	TEXAS
September 14	ARKANSAS STATE
September 21	USC
September 28	MINNESOTA
October 5	at Washington
October 19	at Illinois
October 26	MICHIGAN STATE
November 2	OREGON
November 9	at Indiana
November 23	NORTHWESTERN
November 30	at Ohio State
December 7	at Big Ten Championship Game

- Future Michigan Football Schedules

AWAY GAME TICKETS

Details on away game ticket sales will be communicated later this spring. Away game ticket sales are expected to take place in the April/May timeframe.

PARKING

6/27/24, 10:48 AM

Football Season Ticket Renewal - University of Michigan Athletics

Football Season Ticket Holders had the opportunity to request parking for the 2024 football season prior to December 8. If you are offered the opportunity to purchase parking, your lot assignment will be included on your season ticket renewal application. All parking will be allocated based on priority points. Below are the point thresholds to be offered parking in each of our lots for the 2024 football season:

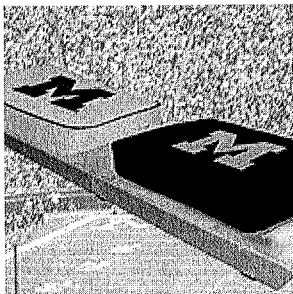
Lot Name	Points	Cost
Champions Lot	\$25K Athletic Annual Giving/Suites	\$520
Blue Lot (car)	1,375	\$440
Grey Lot	750	\$360
Accessible Parking	450	\$440
Brown Lot (car)	300	\$200
Blue Lot (RV)	900	\$1,760

TICKET PACKS AND SINGLE-GAME TICKETS

Be first to learn about future Michigan football ticket opportunities by signing up for **Michigan Insider!**

SEAT CUSHIONS

Seat Cushions are available to rent for the entire season at www.wolverineseats.com.



ADDITIONAL ITEMS

Tickets may not be purchased for the primary purpose of resale and may be cancelled at the discretion of Michigan Athletics. Michigan Athletics reserves the right to monitor sales and withhold season ticket renewal opportunities or cancel ticket orders from accounts that exhibit activity consistent with that of a ticket broker. Ticket brokers are defined as ticket holders who purchase tickets with the primary intent of reselling their tickets for profit or whose accounts indicate high levels of secondary market activity.

6/27/24, 10:48 AM

Football Season Ticket Renewal - University of Michigan Athletics

Season ticket holders attempting to circumvent established ticket limits by creating numerous accounts may have their tickets cancelled at the discretion of Michigan Athletics. Season ticket holders may not have more than eight total regular season tickets and eight total premium season tickets.

If Michigan Athletics detects activity in violation of established policies or indicative of ticket brokering, we reserve the right to reduce or remove number of season tickets for future seasons without notification. We also reserve the right to limit access to standard season ticket benefits to include but not limited to donor onsales for ticket packs/individual game sales, away game tickets, season ticket upgrades, postseason ticketing, etc.

Exhibit 12

6/27/24, 11:00 AM

Football Season Ticket Upgrades - University of Michigan Athletics

FOOTBALL SEASON TICKET UPGRADES



HOW IT WORKS

The online seat selection tool will allow each season ticket holder to:

- Preview seat availability online
- Make seat upgrades/additions from the convenience of your home or office
- Personally customize your season tickets according to all available inventory

**BIG HOUSE 3D
SEATING**

2024 season ticket upgrades will take place between May 13-24. Each season ticket holder will be assigned an upgrade start time, determined by your priority point total as of April 15.

Due to limited availability, season ticket upgrades for the 2024 season will only include seat moves and we will not be able to accommodate seat additions. The only exception for seat additions will be adding stranded single seat locations. Season ticket holders may not add seats that will put them over the limit of eight total regular season tickets and eight total premium season tickets.

6/27/24, 11:00 AM

Football Season Ticket Upgrades - University of Michigan Athletics

You may preview available inventory throughout the upgrade period, including prior to your official start time. Once you reach your designated start time, you will have access to live inventory to adjust your season tickets.

Interested in learning more about or increasing your point total?

FIND MY POINT TOTAL

INCREASE MY POINT TOTAL

Note: Priority point totals as of April 15 will be used to determine upgrade start time.

POLICIES

Due to limited availability, season ticket upgrades for the 2024 season will only include seat moves and we will not be able to accommodate seat additions. The only exception for seat additions will be adding stranded single seat locations. Season ticket holders may not add seats that will put them over the limit of eight total regular season tickets and eight total premium season tickets.

PREFERRED SEAT CONTRIBUTION TIERS

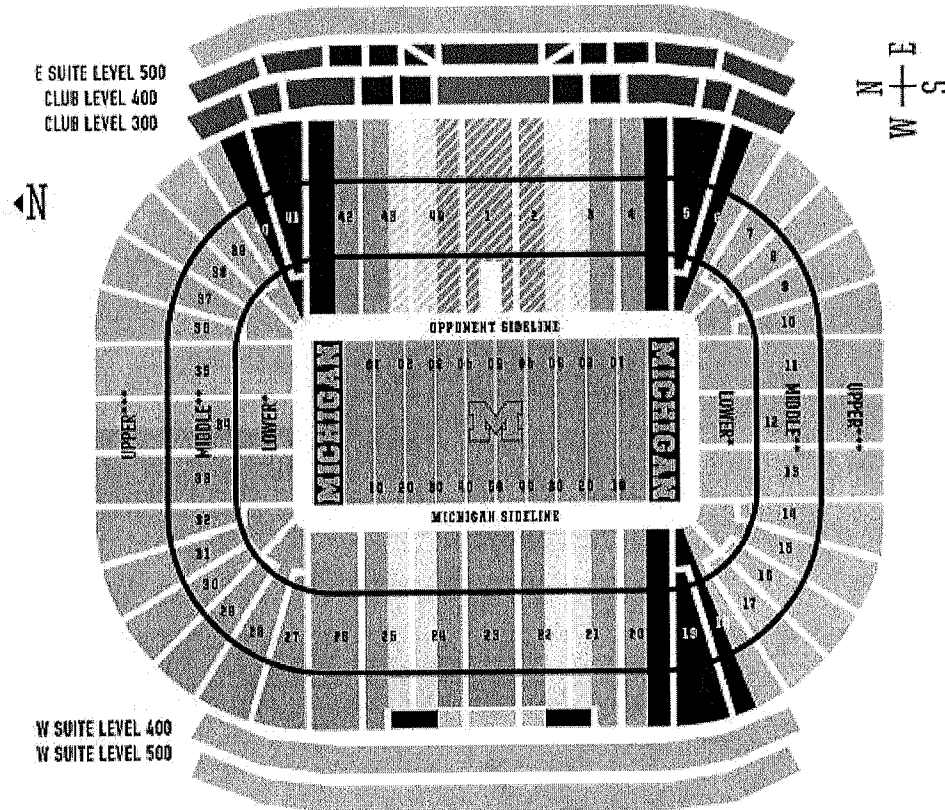
Preferred Seat Contribution Tiers (PDF)

6/27/24, 11:00 AM

Football Season Ticket Upgrades - University of Michigan Athletics

M MICHIGAN STADIUM

2024 Football Preferred Seat Contribution
















LOWER, MIDDLE & UPPER TIERS	
* LOWER = Row A - Row 30	
** MIDDLE = Row 31 - Row 60	
*** UPPER = Row 61+	
VICTORS WEST TIERS	
	PSC
VICTORS WEST LOWER	\$850
VICTORS WEST MIDDLE	\$825
VICTORS WEST UPPER	\$800
VICTORS EAST TIERS	
	PSC
VICTORS EAST LOWER	\$825
VICTORS EAST MIDDLE	\$800
VICTORS EAST UPPER	\$775
VALIANT WEST TIERS	
	PSC
VALIANT WEST LOWER	\$675
VALIANT WEST MIDDLE	\$650
VALIANT WEST UPPER	\$625
VALIANT EAST TIERS	
	PSC

PREMIUM SEAT LOCATION	PSC
INDOOR CLUB	\$4,000
CLUB ZONE 1	\$3,900
CLUB ZONE 2	\$3,825
CLUB ZONE 3	\$2,875
CLUB ZONE 4	\$2,750
CLUB ZONE 5	\$2,000
CLUB ZONE 6	\$1,925
WESTSIDE CHAIR ZONE 1	\$2,675
WESTSIDE CHAIR ZONE 2	\$1,600

6/27/24, 11:00 AM

Football Season Ticket Upgrades - University of Michigan Athletics

	VALIANT EAST LOWER	\$650
	VALIANT EAST MIDDLE	\$625
	VALIANT EAST UPPER	\$575
MAIZE TIERS		PSC
	MAIZE LOWER	\$475
	MAIZE MIDDLE	\$440
	MAIZE UPPER	\$410
BLUE TIERS		PSC
	BLUE LOWER	\$240
	BLUE MIDDLE	\$230
	BLUE UPPER	\$225
END ZONE TIERS		PSC
	END ZONE LOWER	\$100
	END ZONE MIDDLE	\$85
	END ZONE UPPER	\$80

STUDENT SECTION
 **STUDENT SEATING**

ADDITIONAL INFORMATION

Tickets may not be purchased for the primary purpose of resale and may be cancelled at the discretion of Michigan Athletics. Michigan Athletics reserves the right to monitor sales and withhold season ticket renewal opportunities or cancel ticket orders from accounts that exhibit activity consistent with that of a ticket broker. Ticket brokers are defined as ticket holders who purchase tickets with the primary intent of reselling their tickets for profit or whose accounts indicate high levels of secondary market activity.

Season ticket holders attempting to circumvent established ticket limits by creating numerous accounts may have their tickets cancelled at the discretion of Michigan Athletics. Season ticket holders may not have more than eight total regular season tickets and eight total premium season tickets.

If Michigan Athletics detects activity in violation of established policies or indicative of ticket brokering, we reserve the right to reduce or remove number of season tickets for future seasons without notification. We also reserve the right to limit access to standard season ticket benefits to include but not limited to donor onsales for ticket packs/individual game sales, away game tickets, season ticket upgrades, postseason ticketing, etc.

FAQS

6/27/24, 11:00 AM

Football Season Ticket Upgrades - University of Michigan Athletics

What are the requirements to participate? ▲

All current season ticket holders who have paid their full PSC and full season ticket amount are eligible for season ticket upgrades.

If I don't want to change my seats, do I need to login? ▲

No. All season ticket holders will have access to the seating process, but if you do not want to change your seats, you do not need to login to re-select them.

If I choose not to participate, will it affect future years? ▲

No. You will be assigned a time slot, but participation is completely optional. Time slots are determined by priority points each year.

When will this take place? ▲

2024 season ticket upgrades will take place between May 13-24.

How is my individualized date and time determined? ▲

Your selection time is determined by your priority point total as of April 15. For more information on this program, please [click here](#).

If I move seats to a lower PSC level, will I receive a ▲

No. Preferred Seat Contributions are non-refundable.

If I move to a higher PSC level, how will I pay? ▲

Any seat changes that require a balance will need to be paid in full at the time of the upgrade.

6/27/24, 11:00 AM

Football Season Ticket Upgrades - University of Michigan Athletics

Are there any instances where I would not be allowed to select an open seat? ▲

You will not be able to select seats that results in leaving a stranded single seat.

Will I be able to adjust my premium seats or move into premium seats via this process? ▲

Yes. Online upgrades will include premium seats, to include both west chairback and club seating.

Is there a preferred web browser? ▼

Can I select and change my seats multiple times? ▲

Once you have completed the checkout process, you cannot log back in and change seats. You will only be able to change seats or purchase new seats once, and only on or after your assigned date and time.

Can I move my seats into ADA or mobility impaired (no stairs) seats? ▼

Are there any ticket limits? ▲

Due to limited availability, season ticket upgrades for the 2024 season will only include seat moves and we will not be able to accommodate seat additions. The only exception for seat additions will be adding stranded single seat locations. Season ticket holders may not add seats that will put them over the limit of eight total regular season tickets and eight total premium season tickets.

Will I be able to add season tickets to my current number of season tickets? ▲

Due to limited availability, season ticket upgrades for the 2024 season will only include seat moves and we will not be able to accommodate seat additions. The only exception for seat additions will be adding stranded single seat locations. Season ticket holders may not add seats that will put them over the limit of eight total regular season tickets and eight total premium season tickets.

What if I want to move my seats with other season ticket holders? ▼

6/27/24, 11:00 AM

Football Season Ticket Upgrades - University of Michigan Athletics

Do I get to participate if I am a new season ticket holder?

Yes. New season ticket holders will be able to select their seats between May 29-31.

How do I login to the website?

I don't have access to the appropriate technology to make my selection at my scheduled time.

What if I forget my selection time and date?

What do I do if I cannot access the website on the day of my selection?

When will I find out my selection date and time?

Exhibit 13

6/27/24, 10:52 AM

Ticket Policies and Forms - University of Michigan Athletics

TICKET POLICIES AND FORMS

Admittance

Each person is required to have a ticket for entry regardless of age to all events requiring an admission charge. No refunds, no exchanges.

Ticket Resale

Tickets may not be purchased for the primary purpose of resale and may be canceled at the discretion of Michigan Athletics. Michigan Athletics reserves the right to monitor sales and withhold season ticket renewal opportunities or cancel ticket orders from accounts that exhibit activity consistent with that of a ticket broker. Ticket brokers are defined as ticket holders who purchase tickets with the primary intent of reselling their tickets for profit or whose accounts indicate high levels of secondary market activity.

Transfer of Tickets

If you would like to transfer tickets to an individual game, visit [MGoBlue.com/tickets/transfer](https://mgoblue.com/tickets/transfer). If you are interested in permanently transferring all or some of your season tickets, so that someone else becomes the season ticket holder for those seats, visit [MGoBlue.com/go/transfer](https://mgoblue.com/go/transfer).

Note: Priority Point totals, parking permits, and donation histories cannot be transferred to anyone. If a season ticket holder wants to retain away/postseason ticket and/or parking privileges, he or she must retain at least one season ticket in their account.

Change of Name

Only a spouse's name can be added to your account. To remove a spouse's name, please send us a notarized written request signed by the both of you or a certified copy of your divorce papers.

Change of Address

Address changes should be done online at [MGoBlue.com/tickets](https://mgoblue.com/tickets). This can be done by signing in to use your account and using the "My Account" option. Otherwise, print out the **Change of Address Form**, fill it out, and either fax or mail the completed form along with a legible copy of your current driver's license or state ID that includes a signature, to the ticket office. Please note that tickets cannot be forwarded and

6/27/24, 10:52 AM

Ticket Policies and Forms - University of Michigan Athletics

will be returned to the Ticket Office. The deadline for change of address forms for football season ticket holders is the June 1 prior to the upcoming season. If you have any questions call the Ticket Office at 866-296-6849.

Exceeding Ticket Limits

When purchasing tickets on our Site, you may be limited to a specified number of tickets for an event or ticket package (also known as a "ticket limit"). If there is a ticket limit, it will be posted during the purchase process and is verified with every transaction. This policy is in effect to discourage unfair ticket buying practices. Multiple accounts may not be used to circumvent or exceed published ticket limits. We reserve the right to cancel any or all orders and tickets, in addition to prohibiting your ticket purchase abilities, without notice, if you exceed or attempt to exceed, the posted ticket limits. Any tickets, cancelled due to violating the posted ticket limit, will be refunded at face value, excluding any and all fees.

Event Cancellations

If individual events as part of a season ticket package are canceled for any number of reasons (acts of God, weather, community health pandemics, participant transportation failures, etc.), decisions on a refund policy will be made on an event-by-event basis. Depending on the specific situation, refunds or game credits may or may not be an option.

Full-Time Faculty/Staff Discount

Full-time, permanent University of Michigan faculty and staff members receive a 10% discount for football, men's basketball and hockey season tickets. There is a limit of 2 discounted season tickets per sport, and additional tickets must be purchased at the public price. Faculty/staff must follow the current process to obtain season tickets which may involve a donation or deposit. For more information visit [MGoBlue.com/ticketoffice](https://mgoblue.com/ticketoffice). To receive this discount, email a copy of your MCard and your athletic ticket account number to mtickets@umich.edu.

Other

Tickets not purchased through the Michigan Ticket Office, SeatGeek or through the University's authorized agents are not considered valid and the holder may be denied admission or ejected. SeatGeek is the only authorized site through which a resale of tickets may be conducted. Tickets cannot

6/27/24, 10:52 AM

Ticket Policies and Forms - University of Michigan Athletics

be used for third party contests or sweepstakes without approval by the University of Michigan Athletic Department.

Attempting to sell or solicit the sale of a ticket(s) (even at face value) on campus without a permit violates University policy.

Still have a question?

Email the Ticket Office at mtickets@umich.edu.

Note: Online ticket sales for an event end five hours before game time. After that, tickets may be purchased via phone at (866) 296-MTIX during regular business hours (9 a.m.-5 p.m. ET, Monday-Friday) or at the door if an event is not sold out. The only payment accepted at the door of an event is a debit or credit card.

Exhibit 14

From: [Friedman, Alyssa](#)
To: [Shannon Hill](#)
Cc: [Freedom of Information Act Office](#); [Smeltzer, Rob](#)
Subject: RE: FOIA FRI 0304-24
Date: Friday, April 19, 2024 10:10:51 AM
Attachments: [image001.png](#)

Good morning,

I am writing in response to your April 11, 2024, email regarding our Freedom of Information Act request. In regards to request number 2, your email requested further specifications about the documents and/or information sought and asked for a revised request. The revised request for number 2 is as follows: We are seeking all offers to actual or potential football season ticket holders that the University of Michigan made and the terms of such offers, and all solicitations by the University of Michigan for preferred seat contributions for football. As a reminder, the time period for this request is the last 10 years to the present. If it will help resolve the matter, we can reduce this to the last 7 years.

Additionally, request number 3 seeks the terms and conditions applicable to such football season tickets and/or preferred seat contributions. However, your response to this request provided links to general information and frequently asked questions about (1) tickets and promotions; (2) priority points calculation and preferred seat contribution map; (3) season ticket renewal and upgrades; and (4) ticket policies and forms. None of the provided links contain the terms and conditions applicable to the identified football season tickets and/or preferred seat contributions. Moreover, request number 3 seeks such terms and conditions from the last 10 years to the present. Your provided links to the irrelevant information reflect the **current** status of such information only, when we requested the past years as well. Again, if it will help resolve the matter, we can reduce this to the last 7 years. Please supplement your response to request number 3 with the applicable information and documents asked for.

Thank you,



Alyssa Friedman

afriedman@ktslaw.com

Kilpatrick Townsend & Stockton LLP

175 West Jackson Blvd. | Suite 950 | Chicago, IL 60604

T 312 628 7864 | M 949 324 0233 | F 312 896 5754

[My Profile](#) | [vCard](#)

From: Shannon Hill <hillsr@umich.edu>

Sent: Thursday, April 11, 2024 12:18 PM

To: Friedman, Alyssa <afriedman@ktslaw.com>

Cc: Freedom of Information Act Office <foia-email@umich.edu>; Smeltzer, Rob
<rsmeltzer@ktslaw.com>

Subject: FOIA FRI 0304-24

****CAUTION: External Email****

Dear Alyssa Friedman,

I am writing in response to your Freedom of Information Act request dated March 25, 2024, which was received on March 26, 2024.

You requested:

I am requesting an opportunity to inspect or obtain copies of the following, with the time period being the last 10 years of today's date:

1. All letters of intent, memoranda of understanding, contracts, and draft contracts between the University of Michigan and Eventellect on the subject of athletic ticket reselling;
2. All communications between the University of Michigan and actual or prospective football season ticket holders and actual or prospective preferred seat contributors ; and
3. The terms and conditions applicable to such football season tickets and/or preferred seat contributions.

There are no records responsive to item (1) of your request.

Item (2) of your request is overly broad and, pursuant to Section 3 (1) of the Michigan Freedom of Information Act, does not describe a "public record sufficiently to enable the public body to find the public record..." Please identify or describe specifically the records you are seeking by providing the name(s) of the employee(s) and/or office(s) whose communications you are seeking and the relevant subject matter and/or keyword(s) for the records you are seeking. Upon receipt of additional information that will enable us to find responsive records, we will be happy to proceed with processing a revised request.

Regarding item (3) of your request, this office was advised that responsive ticket policies are outlined on the following Michigan Athletics web pages:

- [Main Football Ticket Page](#)
- [Football Season Ticket Renewal Page](#)
- [Football Season Ticket Upgrade Page](#)
- [Ticket Policies and Forms Page](#)

Please note that within 180 days from the date of this letter, you have the right to appeal the denial of information to the President of the University or seek judicial review in the court of claims to try to compel disclosure. If you elect to appeal and the President upholds the denial, you may still seek judicial review within the 180-day period.

An appeal to the President must be submitted in writing to: President's Office, c/o Steve Yaros, The University of Michigan, Ruthven Bldg. Suite 3190, 1109 Geddes Ave., Ann Arbor, Michigan 48109-1079 (or by email to: FOIAappeals@umich.edu). The statement must (1) identify the request and the final determination by the FOIA officer that is being appealed, (2) specifically state the word "appeal," and (3) identify the reason or reasons why the final determination should be reversed.

If you seek judicial review in the Michigan court of claims and prevail, you will be awarded

reasonable attorney's fees, costs and disbursements incurred in maintaining the action. If you prevail in part, you may still be awarded complete or partial reimbursement for those expenses. In addition to actual and compensatory damages, you will be awarded punitive damages in the amount of \$1,000.00 if the court finds that the University was arbitrary and capricious in its denial.

A copy of Section 10 of the Michigan FOIA is available for your reference and review online at <http://foia.vpcomm.umich.edu/foia-right-to-appeal/>.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Hill", with a stylized, cursive script.

Shannon Hill

Acting Chief Freedom of Information Act Officer

Freedom of Information Act Office | University of Michigan

<http://foia.vpcomm.umich.edu> | hillsr@umich.edu | (734) 763-4167

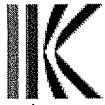
Exhibit 15

From: [Friedman, Alyssa](#)
To: [Shannon Hill](#)
Cc: [Freedom of Information Act Office](#); [Smeltzer, Rob](#)
Subject: RE: FOIA FRI 0304-24
Date: Monday, April 22, 2024 10:12:08 AM
Attachments: [image001.png](#)

Good morning,

By "offers" we mean the University of Michigan's offers to alumni or fans to purchase and communications relating to opportunities to purchase football season tickets or preferred seat contributions and the terms associated with such offers and opportunities.

Thank you,



Alyssa Friedman
afriedman@ktslaw.com
Kilpatrick Townsend & Stockton LLP
175 West Jackson Blvd. | Suite 950 | Chicago, IL 60604
T 312 628 7864 | M 949 324 0233 | F 312 896 5754
[My Profile](#) | [vCard](#)

From: Shannon Hill <hillsr@umich.edu>
Sent: Monday, April 22, 2024 8:01 AM
To: Friedman, Alyssa <afriedman@ktslaw.com>
Cc: Freedom of Information Act Office <foia-email@umich.edu>; Smeltzer, Rob <rsmeltzer@ktslaw.com>
Subject: Re: FOIA FRI 0304-24

Ms. Friedman,

So that we are able to appropriately respond to your request for records of "all offers to actual or potential football season ticket holders that the University of Michigan made and the terms of such offers," can you please clarify what you mean by "offers"?

Thank you,

Shannon Hill
Acting Chief Freedom of Information Act Officer
Freedom of Information Act Office | University of Michigan
<http://foia.vpcomm.umich.edu> | hillsr@umich.edu | (734) 763-4167

On Fri, Apr 19, 2024 at 11:11 AM Friedman, Alyssa <afriedman@ktslaw.com> wrote:

|

Good morning,

I am writing in response to your April 11, 2024, email regarding our Freedom of Information Act request. In regards to request number 2, your email requested further specifications about the documents and/or information sought and asked for a revised request. The revised request for number 2 is as follows: We are seeking all offers to actual or potential football season ticket holders that the University of Michigan made and the terms of such offers, and all solicitations by the University of Michigan for preferred seat contributions for football. As a reminder, the time period for this request is the last 10 years to the present. If it will help resolve the matter, we can reduce this to the last 7 years.

Additionally, request number 3 seeks the terms and conditions applicable to such football season tickets and/or preferred seat contributions. However, your response to this request provided links to general information and frequently asked questions about (1) tickets and promotions; (2) priority points calculation and preferred seat contribution map; (3) season ticket renewal and upgrades; and (4) ticket policies and forms. None of the provided links contain the terms and conditions applicable to the identified football season tickets and/or preferred seat contributions. Moreover, request number 3 seeks such terms and conditions from the last 10 years to the present. Your provided links to the irrelevant information reflect the **current** status of such information only, when we requested the past years as well. Again, if it will help resolve the matter, we can reduce this to the last 7 years. Please supplement your response to request number 3 with the applicable information and documents asked for.

Thank you,



Alyssa Friedman

afriedman@ktslaw.com

Kilpatrick Townsend & Stockton LLP

175 West Jackson Blvd. | Suite 950 | Chicago, IL 60604

T 312 628 7864 | **M** 949 324 0233 | **F** 312 896 5754

[My Profile](#) | [vCard](#)

From: Shannon Hill <hillsr@umich.edu>

Sent: Thursday, April 11, 2024 12:18 PM

To: Friedman, Alyssa <afriedman@ktslaw.com>

Cc: Freedom of Information Act Office <foia-email@umich.edu>; Smeltzer, Rob
<rsmeltzer@ktslaw.com>

Subject: FOIA FRI 0304-24

****CAUTION: External Email****

Dear Alyssa Friedman,

I am writing in response to your Freedom of Information Act request dated March 25, 2024, which was received on March 26, 2024.

You requested:

I am requesting an opportunity to inspect or obtain copies of the following, with the time period being the last 10 years of today's date:

1. All letters of intent, memoranda of understanding, contracts, and draft contracts between the University of Michigan and Eventellect on the subject of athletic ticket reselling;
2. All communications between the University of Michigan and actual or prospective football season ticket holders and actual or prospective preferred seat contributors ; and
3. The terms and conditions applicable to such football season tickets and/or preferred seat contributions.

There are no records responsive to item (1) of your request.

Item (2) of your request is overly broad and, pursuant to Section 3 (1) of the Michigan Freedom of Information Act, does not describe a "public record sufficiently to enable the public body to find the public record..." Please identify or describe specifically the records you are seeking by providing the name(s) of the employee(s) and/or office(s) whose communications you are seeking and the relevant subject matter and/or keyword(s) for the records you are seeking. Upon receipt of additional information that will enable us to find responsive records, we will be happy to proceed with processing a revised request.

Regarding item (3) of your request, this office was advised that responsive ticket policies are outlined on the following Michigan Athletics web pages:

- [Main Football Ticket Page](#)
- [Football Season Ticket Renewal Page](#)
- [Football Season Ticket Upgrade Page](#)
- [Ticket Policies and Forms Page](#)

Please note that within 180 days from the date of this letter, you have the right to appeal the denial of information to the President of the University or seek judicial review in the court of claims to try to compel disclosure. If you elect to appeal and the President upholds the denial, you may still seek judicial review within the 180-day period.

An appeal to the President must be submitted in writing to: President's Office, c/o Steve Yaros, The University of Michigan, Ruthven Bldg. Suite 3190, 1109 Geddes Ave., Ann Arbor, Michigan 48109-1079 (or by email to: FOIAappeals@umich.edu). The statement must (1) identify the request and the final determination by the FOIA officer that is being appealed, (2) specifically state the word "appeal," and (3) identify the reason or reasons why the final determination should be reversed.

If you seek judicial review in the Michigan court of claims and prevail, you will be awarded reasonable attorney's fees, costs and disbursements incurred in maintaining the action. If you prevail in part, you may still be awarded complete or partial reimbursement for those expenses. In addition to actual and compensatory damages, you will be awarded punitive damages in the amount of \$1,000.00 if the court finds that the University was arbitrary and capricious in its denial.

A copy of Section 10 of the Michigan FOIA is available for your reference and review online at <http://foia.vpcomm.umich.edu/foia-right-to-appeal/>.

Sincerely,



Shannon Hill

Acting Chief Freedom of Information Act Officer

Freedom of Information Act Office | University of Michigan

<http://foia.vpcomm.umich.edu> | hillsr@umich.edu | (734) 763-4167

Confidentiality Notice:

This communication constitutes an electronic communication within the meaning of the Electronic Communications Privacy Act, 18 U.S.C. Section 2510, and its disclosure is strictly limited to the recipient intended by the sender of this message. This transmission, and any attachments, may contain confidential attorney-client privileged information and attorney work product. If you are not the intended recipient, any disclosure, copying, distribution or use of any of the information contained in or attached to this transmission is STRICTLY PROHIBITED. Please contact us immediately by return e-mail or at 404 815 6500, and destroy the original transmission and its attachments without reading or saving in any manner.

Exhibit 16

From: Shannon Hill
To: Friedman, Alyssa
Cc: Freedom of Information Act Office; Smeltzer, Rob
Subject: FOIA FRI 0304-24 (Revised)
Date: Monday, April 29, 2024 1:13:59 PM

****CAUTION: External Email****

Dear Alyssa Friedman,

I am writing in response to your revised Freedom of Information Act request dated April 19, 2024, which was received on April 22, 2024. You further clarified your request in an email dated April 22, 2024.

You requested:

In regards to request number 2, your email requested further specifications about the documents and/or information sought and asked for a revised request. The revised request for number 2 is as follows: We are seeking all offers to actual or potential football season ticket holders that the University of Michigan made and the terms of such offers, and all solicitations by the University of Michigan for preferred seat contributions for football. As a reminder, the time period for this request is the last 10 years to the present. If it will help resolve the matter, we can reduce this to the last 7 years.

Additionally, request number 3 seeks the terms and conditions applicable to such football season tickets and/or preferred seat contributions. However, your response to this request provided links to general information and frequently asked questions about (1) tickets and promotions; (2) priority points calculation and preferred seat contribution map; (3) season ticket renewal and upgrades; and (4) ticket policies and forms. None of the provided links contain the terms and conditions applicable to the identified football season tickets and/or preferred seat contributions. Moreover, request number 3 seeks such terms and conditions from the last 10 years to the present. Your provided links to the irrelevant information reflect the current status of such information only, when we requested the past years as well. Again, if it will help resolve the matter, we can reduce this to the last 7 years. Please supplement your response to request number 3 with the applicable information and documents asked for.

You clarified in an email dated April 22, 2024:

By "offers" we mean the University of Michigan's offers to alumni or fans to purchase and communications relating to opportunities to purchase football season tickets or preferred seat contributions and the terms associated with such offers and opportunities.

Your request is denied. To the extent that responsive communication records may exist, they are not maintained in an electronically retrievable format. Regarding your request related to terms and conditions, there are no additional responsive records to provide other than those

included in the University's response of April 11, 2024.

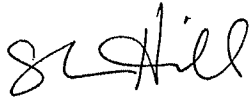
Please note that within 180 days from the date of this letter, you have the right to appeal the denial of information to the President of the University or seek judicial review in the court of claims to try to compel disclosure. If you elect to appeal and the President upholds the denial, you may still seek judicial review within the 180-day period.

An appeal to the President must be submitted in writing to: President's Office, c/o Steve Yaros, The University of Michigan, Ruthven Bldg. Suite 3190, 1109 Geddes Ave., Ann Arbor, Michigan 48109-1079 (or by email to: FOIAappeals@umich.edu). The statement must (1) identify the request and the final determination by the FOIA officer that is being appealed, (2) specifically state the word "appeal," and (3) identify the reason or reasons why the final determination should be reversed.

If you seek judicial review in the Michigan court of claims and prevail, you will be awarded reasonable attorney's fees, costs and disbursements incurred in maintaining the action. If you prevail in part, you may still be awarded complete or partial reimbursement for those expenses. In addition to actual and compensatory damages, you will be awarded punitive damages in the amount of \$1,000.00 if the court finds that the University was arbitrary and capricious in its denial.

A copy of Section 10 of the Michigan FOIA is available for your reference and review online at <http://foia.vpcomm.umich.edu/foia-right-to-appeal/>.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon Hill", with a stylized flourish at the end.

Shannon Hill
Acting Chief Freedom of Information Act Officer
Freedom of Information Act Office | University of Michigan
<http://foia.vpcomm.umich.edu> | hillsr@umich.edu | (734) 763-4167

Exhibit 17



Kilpatrick Townsend & Stockton LLP
ktslaw.com

175 W. Jackson Boulevard, Suite 950
Chicago, IL 60604
t 312-364-2500 f 312-364-1003
Alyssa H. Friedman
direct dial 312-628-7864
afriedman@ktslaw.com

May 3, 2024

President's Office
c/o Steve Yaros
The University of Michigan
Ruthven Bldg, Suite 3190
1109 Geddes Ave.
Ann Arbor, Michigan 48109
FOIAappeals@umich.edu

Re: Appeal of FOIA Request FRI 0304-24

Dear Mr. Yaros:

I am appealing the University of Michigan's April 29, 2024, final determination to deny the request for public records I submitted on March 25, 2024, pursuant to Michigan's Freedom of Information Act. For the reasons set forth below, the University of Michigan's denial is improper and without sufficient justification. The denial must be reversed.

FOIA Requests

On March 25, 2024, I submitted a Freedom of Information Act ("FOIA") request to the University of Michigan requesting an opportunity to inspect or obtain copies of the following, with the time period being the last 10 years: (1) All letters of intent, memoranda of understanding, contracts, and draft contracts between the University of Michigan and Eventellect on the subject of athletic ticket reselling; (2) All communications between the University of Michigan and actual or prospective football season ticket holders and actual or prospective preferred seat contributors; and (3) The terms and conditions applicable to such football season tickets and/or preferred seat contributions. *See* FOIA Request, attached hereto as "Exhibit A."

The acting chief FOIA officer of the University of Michigan, Shannon Hill, responded to my FOIA request on April 11, 2024, as follows: (1) stating that there are no records responsive to Request No. 1; (2) stating that Request No. 2 was overbroad but upon receipt of additional information, Ms. Hill would proceed with processing a revised request; and (3) in response to Request No. 3, providing links to University of Michigan webpages displaying general information and frequently asked questions about (a) tickets and promotions; (b) priority points calculation and preferred seat contribution map; (c) season ticket renewal and upgrades; and (d) ticket policies and forms. *See* April 11th FOIA Response, attached hereto as "Exhibit B."

May 3, 2024
Page 2

On April 19, 2024, I provided more specificity as to Request No. 2, clarifying that we are seeking all offers to actual or potential football season ticket holders that the University of Michigan made and the terms of such offers, and all solicitations by the University of Michigan for preferred seat contributions for football. *See* April 19th email, attached hereto as “Exhibit C.” I additionally addressed Ms. Hill’s insufficient response to Request No. 3 and asked for a supplement response as none of the provided links contained the terms and conditions applicable to the identified football season tickets and/or preferred seat contributions, and similarly, such links reflected the current status of such information despite our request seeking documents from the past 10 years to the present. At this time, we also informed Ms. Hill that we are willing to reduce the time frame applicable to Request Nos. 2 and 3 to the last 7 years in an effort to resolve the matter. Subsequently on April 22, 2024, Ms. Hill asked us to clarify what we meant by “offers” in our supplemental specification for Request No. 2, to which we responded, “the University of Michigan’s offers to alumni or fans to purchase and communications relating to opportunities to purchase football season tickets or preferred seat contributions and the terms associated with such offers and opportunities.” *See* April 22nd Email Exchange, attached hereto as “Exhibit D.”

On April 29, 2024, Ms. Hill made the final determination to deny Request Nos. 2 and 3. *See* Denial of FOIA Request, attached hereto as “Exhibit E.” Ms. Hill stated that “[t]o the extent that responsive communication records may exist, they are not maintained in an electronically retrievable format.” Moreover, in response to Request No. 3, Ms. Hill stated that there are no additional responsive records other than those included in her April 11, 2024, response.

Denial of Request No. 2

Ms. Hill’s final determination to deny Request No. 2 is improper for many reasons and must be reversed. Pursuant to the Michigan Freedom of Information Act (the “Act”), public record means a writing prepared, owned, used, in the possession of, or retained by a public body in the performance of an official function, from the time it is created. *See* MCL § 15.232(i). “Writing” includes, but is not limited to, handwriting, typewriting, printing, photocopying, letters, words, papers, hard drives, and every other means of recording. *See* MCL § 15.232(l). Ms. Hill’s denial of Request No. 2 on the basis that such records are not maintained in an electronically retrievable format contradicts the express language of the Act. There is no requirement that responsive records are limited to those in an electronically retrievable format in order to be obtainable under the Act. Public records mean a “writing” which includes handwriting, typewriting, photocopying, letters, papers, and *every other means of recording*. Additionally, the contention that records of offers to purchase and communications relating to opportunities to purchase season tickets or preferred seat contributions are not electronically retrievable is not credible.

Moreover, public records include all that are not exempt under Section 13 and that are subject to disclosure under the Act. *See* MCL § 15.232(i)(ii). Ms. Hill did not assert that the documents and communications requested fall under any of the exemptions delineated in Section 13 of the Act. As such, the requested records are subject to disclosure under the Act. Further, Ms. Hill’s denial “to the extent that responsive records may exist” is unreasonably vague. If such documents and communications do not exist, Ms. Hill’s written notice denying this request should have included

May 3, 2024

Page 3

a certificate affirming that such public records do not exist. *See* MCL § 15.235(5)(b). Accordingly, Ms. Hill has not provided any justifiable reason for denial.

Denial of Request No. 3

Ms. Hill's denial of Request No. 3 is similarly lacking. Ms. Hill's assertion that her April 11, 2024, response providing website links to irrelevant information represents the entirety of public records responsive to Request No. 3 is without merit. Specifically, Ms. Hill asserts that links to general information and frequently asked questions about tickets, priority points calculations, and season ticket upgrades are responsive to Request No. 3 which seeks the terms and conditions applicable to football season tickets and preferred seat contributions. Clearly, such links do not provide the applicable terms and conditions. Moreover, Request No. 3 seeks such information from at least the past 10 years, but at a minimum, the past 7 years up to the present. Ms. Hill's denial does not address nor remedy the glaring issue that such links, while non-responsive, reflect the *current status* of such information. We know that the terms and conditions of season tickets and preferred seat contributions would change from year to year, thus a link to any current terms and conditions does not allow us to see when and how such terms and conditions changed. It is inconceivable how links to irrelevant non-responsive information represent a complete response to Request No. 3, and we find it highly improbable that the University of Michigan does not have *any* records of the terms and conditions applicable to season tickets and preferred seat contributions from within the past 7-10 years.

For the reasons set forth above, Ms. Hill's final determination denying Request Nos. 2 and 3 is without merit and fails to provide a sufficient basis for denial under the Act. Accordingly, we appeal this decision. As a reminder, the Act requires a response to this appeal within 10 business days after receipt of this appeal.

Best regards,

Alyssa H. Friedman

Kilpatrick Townsend & Stockton LLP

Exhibit 18



3190 Ruthven Building
1109 Geddes Avenue
Ann Arbor, Michigan 48109-1079
TEL: 734 764-6270

May 16, 2024

Alyssa Friedman
Sent via email to afriedman@ktslaw.com

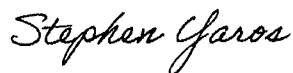
RE: Appeal of FOIA, University File FRI 0304-24

Dear Alyssa Friedman,

I am writing in response to your letter dated Friday, May 3, 2024, which was received in the President's Office on Friday, May 3, 2024, appealing the response dated Monday, April 29, 2024, from Ms. Shannon Hill, Acting Chief Freedom of Information Act Officer, to the Freedom of Information Act (FOIA) inquiry referenced above.

Pursuant to Section 10 (2) (d) of the Michigan Freedom of Information Act, the University is "extending for not more than 10 business days the period during which the head of the public body shall respond." At this time, we expect to respond by Thursday, May 30, 2024.

Sincerely,



Steve Yaros
Interim Chief of Staff
Office of the President

Exhibit 19



3190 Ruthven Building
1109 Geddes Avenue
Ann Arbor, Michigan 48109-1079
TEL: 734 764-6270

May 30, 2024

Alyssa Friedman
Sent via email to afriedman@ktslaw.com

RE: Appeal of FOIA, University File FRI 0304-24

Dear Alyssa Friedman,

I am writing in response to your letter dated Friday, May 3, 2024, which was received in the President's Office on Friday, May 3, 2024, appealing the response dated Monday, April 29, 2024, from Ms. Shannon Hill, Acting Chief Freedom of Information Act Officer, to the Freedom of Information Act (FOIA) inquiry referenced above.

Your appeal has been carefully considered and is denied for the reasons stated in Ms. Hill's response of Monday, April 29, 2024, which will not be repeated herein.

Please note that within 180 days from the date of the letter from the Freedom of Information Act Officer denying your request, you have the right to seek judicial review in the circuit court to try to compel disclosure. If you seek judicial review in the Michigan circuit court and prevail, you will be awarded reasonable attorney's fees, costs and disbursements incurred in maintaining the action. If you prevail in part, you may still be awarded complete or partial reimbursement for those expenses. In addition to actual and compensatory damages, you will be awarded punitive damages in the amount of \$1,000 if the court finds that the University was arbitrary and capricious in its denial.

Sincerely,



Steve Yaros
Interim Chief of Staff
Office of the President